

REMARKS/ARGUMENTS

Claims 1-42 are currently pending in this application. By this Amendment, claims 1, 2, 7, 12-14, 22, 25, 26, 31-36 and 40 have been amended. Support for these claims may be found at least in paragraphs [0042]-[0045] of the application. No new matter is added. Applicants respectfully request reconsideration of this application based on the above amendments and the following remarks.

Claim Rejections – 35 USC § 102 and § 103

The Office Action rejects claims 1-25, 27-32 and 37-42 under 35 U.S.C. § 102(b) as being anticipated by Haas (US 6,304,556); and rejects claims 26 and 33-36 under 35 U.S.C. § 103(a) as being unpatentable over Haas in view of Juitt (US 7,042,988). To the extent these rejections remain applicable to the claims, as amended, the Applicants respectfully traverse these rejections, as follows.

Claim 1 recites, *inter alia*, “a processor configured to support an inter-cluster call between second and third terminals by establishing a route on the ad hoc network backbone for each communication packet transmitted from the second terminal to the third terminal, wherein *the route on the ad hoc network backbone depends on whether the inter-cluster call is a first type of call or a second type of call* that is different from the first type of call” (emphasis added). Independent claims 12, 25, 26 and 31-36 recite similar features.

In rejecting the claims, the Examiner alleges that Haas, in col. 8, lines 37 to col. 9, line 63, discloses a processor that is configured to establish different routes depending on whether a call is of a first type or a second type. The Applicants respectfully disagree.

Haas, in col. 8, lines 37 to col. 9, line 63, with reference to Fig. 4, discloses a multi-node network 50 consisting of a plurality of communication nodes, some of which are designated as mobility reporting centers (MRCs) 54, 56, 58, and 60. Each of the MRCs is assigned to a respective management zone. When a node in one zone needs to communicate with another node in a different zone, a zone routing protocol establishes a “spine route” linking the two nodes via the respective zone’s MRCs and other intermediate nodes. Haas discloses that this “spine route” is used to locate “optimal routes” from a source node to a destination node, but does not disclose whether any such “optimal route” depends on the type of communication (e.g., call) requested by the source node. Haas merely states that the “spine route allows ... querying of the

peripheral nodes [to] be restricted to only those peripheral nodes that are in the 'direction' of the spine route." See Haas at col. 9, lines 47-54. Establishing a communications route by restricting the querying in the manner disclosed in Haas is completely different from establishing a communications route based on the *type* of communication between the source and destination nodes. Haas nowhere suggests that the zone routing protocol takes into account the type of communication between the nodes when calculating the "optimal route." Thus, Haas fails to disclose or suggest a device, method, or apparatus that establishes a route on the ad hoc network backbone, wherein *the route depends on whether the inter-cluster call is a first type of call or a second type of call*, as recited in claims 1, 12, 25-26 and 31-36.

Accordingly, the Applicants respectfully submit that Haas fails to disclose or suggest at least the features recited in claims 1, 12, 25, 26, and 31-36.

Secondary reference Juitt, either individually or in combination with Haas, also fails to disclose or suggest a device, method, or apparatus that establishes a route on the ad hoc network backbone, wherein *the route depends on whether the inter-cluster call is a first type of call or a second type of call*, as recited in claims 1, 12, 25, 26 and 31-36, and as such, fails to make up for the deficiencies of Haas.

In accordance with the above remarks, Applicants respectfully submit that Haas and Juitt, either individually or in combination, fail to disclose or suggest at least the features recited in claims 1, 12, 25, 26 and 31-36.

Accordingly, Applicants submit that claims 1, 12, 25, 26 and 31-36 define patentable subject matter. Claims 2-11, 13-24, 27-30, and 37-42 depend from claims 1 and 12, respectively, and therefore, also define patentable subject matter, as well as for the additional features recited therein.

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CONCLUSION

In light of the above, Applicants submit that the application is in condition for allowance, for which early action is requested.

Please charge any fees or overpayments that may be due with this response to Deposit Account No. 17-0026.

Respectfully submitted,

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